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Attorneys for Plaintiff Morayo Orekoya

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

MORAYO OREKOYA, individually
and on behalf of similarly situated
employees

Plaintiff

vs.

H2 MARKETING CONSULTANTS
LLC, HEATHER HELLMANN

Defendants.

Case No. 2:22-CV-01155-AC

**STIPULATION AND ORDER TO
EXTEND TIME FOR DEFENDANTS
H2 MARKETING CONSULTANTS
LLC AND HEATHER HELLMANN
TO FILE AN ANSWER OR
OTHERWISE RESPOND TO
PLAINTIFF'S INITIAL COMPLAINT**

Judge: Hon. Allison Claire
Dept.: 26

Complaint Filed: July 1, 2022
Trial Date: TBD

1 Plaintiff Morayo Orekoya (“Plaintiff”) and Defendants H2 Marketing
2 Consultants LLC and Heather Hellmann (collectively “Defendants”) by and through
3 their undersigned counsel of record, hereby stipulate and request that Defendants
4 receive an extension to file and serve a response to Plaintiff’s initial Complaint on or
5 before January 31, 2023.

6 Local Rule 144(a) states, “[u]nless the filing date has been set by order of the
7 Court, an initial stipulation extending the time for no more than twenty-eight (28) days
8 to respond to a complaint [...] may be filed without approval of the Court if the
9 stipulation is signed on behalf of all parties who have appeared in the action and are
10 affected by the stipulation. All other extensions of time must be approved by the
11 Court. No open extensions of time by stipulation of the parties will be recognized.”

12 Plaintiff commenced the above-entitled action by filing a complaint
13 (“Complaint”) on or about July 1, 2022. Plaintiff served the Complaint on Defendants
14 on or about November 15, 2022. After being served with the complaint, Defendants
15 requested, and Plaintiffs agreed to, additional time to retain counsel, have that counsel
16 evaluate the claims asserted in Plaintiff’s Complaint, and to respond to Plaintiff’s
17 Complaint.

18 Defendants retained counsel earlier this year to evaluate the claims asserted in
19 Plaintiff’s Complaint. Counsel for Defendants is concurrently filing an Appearance
20 of Counsel in the above-entitled matter. Further, Plaintiff and Defendant are currently
21 engaging in discussions as to the claims and defenses in this matter for purposes,
22 including, but not limited to, settlement. In these discussions, counsel for Defendants
23 requested, and counsel for Plaintiff consented, to additional time to for Defendants to
24 respond to Plaintiff’s Complaint.

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1 Plaintiff and Defendants stipulate and request that this Court allow Defendants
2 to respond to Plaintiff's Complaint on or before January 31, 2023.

3
4 Dated: January 19, 2023

HAHN LOESER & PARKS LLP

5
6 By: /s/Brent M. Douglas
7 Brent M. Douglas
8 Attorney for Defendants
9 H2 Marketing Consultants LLC and
Heather Hellmann

10 Dated: January 19, 2023


CLAYEO C. ARNOLD, A PROFESSIONAL
LAW CORPORATION

11
12 By: /s/Joshua H. Watson (as authorized on 01/18/23)
13 Joshua H. Watson
14 Attorney for Plaintiff Morayo Orekoya

15 **ORDER**

16
17 IT IS HEREBY ORDERED that Defendants H2 Marketing Consultants LLC
18 and Heather Hellmann have until January 31, 2023, to answer or otherwise respond to
19 Plaintiff Morayo Orekoya's initial Complaint in this action.

20
21 DATED: January 19, 2023


ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE